



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Lea M. Drozdoff, P.E., Administrator

April 29, 2008

Erin Merrill
NORCAL Waste Systems
160 Pacific Avenue
San Francisco CA 94111

Reference: With respect to NORCAL Waste Systems and the correspondence dated April 2, 2008

Subject: Completeness Review of Jungo Landfill Application (Application)

Dear Ms. Merrill:

Thank you for your Application to construct a Class I facility. The Nevada Division of Environmental Protection (NDEP) has had an opportunity to conduct a preliminary review and herein provides any comments. The NDEP finds the Application incomplete in accordance with NAC 444.641. The NDEP will proceed in reviewing the Application and determine whether it meets the applicable statutory requirements once a complete Application is received. Please find items required to complete the application below.

1. NAC 444.677(2)(9)
Please provide Proof of Ownership and a copy of the Special Use Permit issued by Humboldt County. Also please provide local contact information, a local address is given but no personal contact information.
2. NAC 444.645(2)
Please provide a summary of the QA/QC Plan for all liners systems as inclusion into the application to include as a portion of the technical review of the application.
3. NAC 444.680 Please provide the following:
 - (b) Show the topography of the site before the development.
 - (d) Show any proposed soil borrow areas. [As a matter of note calculations show a deficit of ~132,000 yd³ of soil, please identify where this will be taken from]
 - (j) Show fencing, equipment shelter, employee facilities and all other features for the development of the site.
4. Define the population and area(s) to be served by the site.
5. Define the anticipated types, quantities and sources of solid wastes (and special wastes) to be disposed of at the site, *for each waste to be accepted including "Special Wastes (see below)"*

4. NAC 444.7483 (5) Please provide the certification below.
(b) *Certified by a qualified ground-water scientist* and approved by the solid waste management authority. Within 14 days after receiving certification and approval, the owner or operator shall place the certification in the records for the site.
5. Please include in the Application a procedure that includes a test meeting the requirements of: NAC 444.692(4) As used in this section, "liquid waste" means any waste material which is determined to contain free liquids as a result of a paint filter liquids test, Method 9095, described in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Environmental Protection Agency, Publication No. SW-846, as adopted by reference in NAC 444.636.
6. NAC 444.696 Control of erosion and dust. (NRS 444.560)¹
 1. Suitable grasses must be planted, as required, in completed areas of the landfill to prevent erosion, surface deterioration and fugitive dust. Revisit RUSLE calculation for soil loss.
7. NAC 444.700 Facilities for personnel. (NRS 444.560) Suitable shelter and sanitary facilities must be provided for operating personnel and waste transport personnel.
Please provide a complete description of the facilities that will be used by both the 25 to 30 people working onsite and visiting personnel, and include in item 3 above.
8. NAC 444.7025 Operating records required to be kept; notice to solid waste management authority. (NRS 444.560)
 1. The owner or operator of a Class I site shall record and retain at the site in the operating records or at a location approved by the solid waste management authority, the following information as it becomes available:
Please include a description of where and under what circumstances records will be maintained and made available for review during an inspection.
9. As the Application includes the acceptance of "Special Wastes" as itemized below I would suggest a review of your application to ensure it meets the statutory needs:

NAC 444.648 Disposal of special wastes: Waste tires. (NRS 444.560)
 1. Disposal of waste tires by open dumping is prohibited.
 2. Disposal of waste tires by open burning is prohibited.
 3. Waste tires which are disposed of by landfilling and which are not incorporated with other wastes in a landfill for which a permit has been issued by a solid waste management authority pursuant to NAC 444.6405 must be chipped, split or otherwise handled in a manner approved by the solid waste management authority which:
 - (a) Prevents tires from resurfacing after they have been covered;
 - (b) Reduces the possibility of a fire at the landfill;
 - (c) Controls vectors; and
 - (d) Otherwise protects the environment and public health.

¹ Typically a native seed mixture can be acquired from the Bureau of Land Management for replanting the Cover during the period of Post Closure.

NAC 444.652 Disposal of special wastes: Construction and demolition wastes. (NRS 444.560)²
Landfills incorporating large quantities of construction and demolition wastes of combustible nature must be cross-sectioned into cells by compacted cover material to prevent spread of accidental fires.

If Septage and Sewage are to be accepted, please include a management process for review and approval
As noted below.

NAC 444.654 Disposal of special wastes: Septic tank pumpings and raw sewage. (NRS 444.560)

1. Septic tank pumpings and raw sewage must not be disposed of by land spreading, unless it is specifically determined and approved in writing by the solid waste management authority that such disposal can be conducted with assured, adequate protection of public health and safety and the environment.
2. The disposal of raw sewage and the septic tank pumpings at a municipal solid waste landfill unit or a Class III site are prohibited.

The Permit Application notes that Industrial Sectors will be served and presumably Industrial Wastes will be accepted. Please include a complete description (I have included statutory descriptions for your convenience) of any and all that are to be accepted at the facility.

NAC 444.585 "Industrial solid waste" defined. (NRS 444.560)

1. "Industrial solid waste" means solid waste derived from industrial or manufacturing processes, including, but not limited to, the solid waste generated by the:
 - (a) Generation of electric power;
 - (b) Manufacture of fertilizer and agricultural chemicals;
 - (c) Manufacture of food and its related products and by-products;
 - (d) Manufacture of inorganic chemicals;
 - (e) Manufacture of leather and products made from leather;
 - (f) Manufacture of nonferrous metals, including the foundries which manufacture those metals;
 - (g) Manufacture of organic chemicals;
 - (h) Manufacture of plastics, resins and other miscellaneous products made from plastic;
 - (i) Pulp and paper industry;
 - (j) Manufacture of rubber and other miscellaneous products made from rubber;
 - (k) Manufacture of products made from stone, glass, clay and concrete;
 - (l) Manufacture of textiles;
 - (m) Manufacture of transportation equipment;
 - (n) Treatment of water;
 - (o) Manufacture of iron and steel; and
 - (p) Construction, refurbishing or demolition of buildings or other structures.

² Please note that this is a Class III material (in conjunction with the industrial wastes noted below) and may also necessitate a Class III Permit.

Erin Merrill
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2. The term does not include waste generated by the mining, oil and gas industry...
Any questions regarding this may be directed to the undersigned at 775-687-9477 or
jtaylor@ndep.nv.gov.

Sincerely,

Original Signed

Jon Taylor PE CEM
Staff Engineer III
Solid Waste Branch
Bureau of Waste Management

JT:jm

cc: Ken Haskell Golder Associates Inc. 1009 Enterprise Way Suite 350 Roseville California 95678

ec: Eric Noack, Ed Glick

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